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7 Attorneys for Defendant  
8 GOOGLE LLC

9  
10 IN THE UNITED STATES DISTRICT COURT

11 FOR THE NORTHERN DISTRICT OF CALIFORNIA

12 JALON HALL,

13 Plaintiff,

Case No.: 4:23-cv-06574-JST

**STIPULATION TO STAY CASE**

14 v.

15 GOOGLE LLC,

16 Defendant.

Complaint Filed: December 21, 2023

Trial Date: None Set

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19 Defendant Google LLC (“Google”) and Plaintiff Jalon Hall (“Hall”) (collectively, the  
20 “Parties”), hereby submit this Stipulation to Stay this case for 30 days for all purposes and  
21 respectfully request that the Court extend the current deadlines as follows:

22 WHEREAS, Google filed its Motion to Dismiss Plaintiff’s Complaint on March 5, 2024  
23 (ECF No. 12);

24 WHEREAS, on March 8, 2024, Hall filed an Opposition/Response to the Motion to Dismiss  
25 seeking a fourteen (14) day extension (from March 19, 2024 until April 3, 2024) of time to respond  
26 to the Motion to Dismiss and retain legal counsel (ECF No. 21), which the Court granted (ECF No.  
27 22);

28 WHEREAS, on March 29, 2024, Hall contacted Google seeking its consent to a 30-day stay

1 this action for 30 days so that Hall could retain legal counsel;

2 WHEREAS, the Initial Case Management Conference was set for April 2, 2024 at 2:00 PM  
3 (ECF No. 11), and has been reset for July 2, 2024 (ECF No. 26);

4 WHEREAS, the Parties' General Order No. 71 Disclosures are due April 4, 2024 (ECF No.  
5 2);

6 WHEREAS, the Hearing on Google's Motion to Dismiss is set for May 2, 2024 at 2:00 PM  
7 (ECF No. 19);

8 WHEREAS, the parties desire to stay this action for 30 days to afford Hall an opportunity to  
9 retain legal counsel;

10 NOW THEREFORE, subject to the Court's approval, the Parties hereby stipulate and agree  
11 that this action should be stayed for 30 days and all deadlines be extended as follows:

<b>Event</b>	<b>Prior Deadline</b>	<b>New Deadline</b>
Opposition to Motion to Dismiss	April 3, 2024	May 3, 2024
Reply in Support of Motion to Dismiss	April 10, 2024	May 10, 2024
Parties General Order No. 71 Disclosures	April 4, 2024	May 6, 2024

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18 The Parties respectfully request that the Court extend these deadlines and reset the Motion to  
19 Dismiss hearing at the Court's earliest convenience by signing and entering the concurrently  
20 submitted Proposed Order to Stay this Case and Extend Pending Deadlines Pursuant to Stipulation of  
21 the Parties.

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1 Dated: April 1, 2024

**DUANE MORRIS LLP**

2 By: /s/Katherine Huibonhoa  
3 KATHERINE C. HUIBONHOA  
4 Attorneys for Defendant  
GOOGLE LLC

5 Dated: April 1, 2024

**JALON HALL**

6 By: /s/Jalon Hall  
7 Jalon Hall, Pro Se

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